



STATEMENT OF BASIS
Page 1 of 1
BAQ Air Permitting Division

Company Name:	Insurance Institute for Business and Home Safety	Permit Writer:	Christopher Hardee, P.E.
Permit Number:	CM-0640-0067 (1 st Revision)	Date:	DRAFT

DATE APPLICATION RECEIVED: April 25, 2018

FACILITY DESCRIPTION

IBHS conducts research to determine the susceptibility of various building materials (components and assemblies) to natural disasters and atmospheric weathering.

PROJECT DESCRIPTION

Conditions C.4, C.5, C.6, and C.9 include material and operational limitations, for several processes, that were intended to ease the demonstration of compliance with federally enforceable limits and modeled concentrations. The facility's current operational needs no longer reflect those used to allocate these limitations. These conditions are now creating unnecessary limitations on the facility.

During a conference call on 4/6/18 with the facility, consultant, and Technical Management, it was agreed that the best course of action was to remove the material and operational limitations and have the facility demonstrate compliance via emission calculation and comparison to the limitations and modeled rates. A condition is being added to address the modeling rate comparisons.

Additional Changes

With the exception of CO and HAPs, the facility's PTE is below major source thresholds for Title V and PSD. The existing permit established MACT and Title V avoidance limits for all pollutants and an additional PSD avoidance limit for CO. No limit was established for PM; however, current calculations assume PM = PM₁₀, and there is a < 100.0 TPY limit for PM₁₀. For clarity, a < 250.0 TPY limit for PM will be added to the permit during this revision.

In the ambient emission rate attachment, Std. 8 pollutants with no established maximum allowable concentration were removed as they added no value and could add confusion.

PUBLIC NOTICE

This Conditional Major Permit will undergo a 30-day public notice period in accordance with SC Regulation 61-62.1, Section II.N. The comment period was open from June 22, 2018 to July 21, 2018 and was placed on the BAQ website during that time period.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.